

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

IN RE: VEHICLE TRACKING AND  
SECURITY SYSTEM ('844) PATENT  
LITIGATION

MDL NO. 11-2249

PJC LOGISTICS, LLC,

Plaintiff,

v.

ACT TRANSPORTATION, *et al.*,

Defendants.

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Case No.: 0:11-cv-02552 (DWF/SER)

(Transferred from District of Nevada;  
Civil Action No. 2:11-cv-00418-GMN-CWH)

**JURY TRIAL DEMANDED**

**REQUEST FOR ENTRY OF DEFAULT**

Plaintiff PJC Logistics, LLC ("Plaintiff") hereby requests that the Clerk enter default in this matter against Hendrickson Trucking, Inc. ("Hendrickson Trucking") on the ground that Hendrickson Trucking has failed to respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. *See* Affidavit for Entry of Default at ¶ 3.

Plaintiff served the summons and complaint on Hendrickson Trucking on July 18, 2011, as evidenced by the proof of service on file with this court. (Dkt. 38) Hendrickson Trucking was required to respond within twenty-one days but did not do so. Plaintiff is informed and believes that Hendrickson Trucking is not an infant, incompetent, or in the military service. *Id.* at ¶ 6.

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff requests entry of default. In support of this request, Plaintiff relies upon the record in this case and the affidavit submitted herewith.

Respectfully submitted,

Dated: March 13, 2012.

/s/ Steven R. Daniels

Steven R. Daniels

(Admitted Pro Hac Vice)

Texas State Bar No. 24025318

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**PJC Logistics, LLC**